

From: [Mason, Steve](#)
To: Dwascome@iterm.com; [Mike Taylor](#); [Nicole Bealle](#); [Kendra Bernhagen](#)
Subject: TCEQ Statement for the ITC WWTP
Date: Tuesday, April 02, 2019 11:49:00 PM

Mike, this is from TCEQ this morning...

With Regards, Steve



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"Frequently, my thoughts get bored and walk down to my mouth. Often, this is a bad thing."

Intercontinental Terminals Company (ITC) is currently authorized to discharge certain wastewater streams under TPDES Permit No. WQ0001984000. ITC's Waste Management Plan indicates that ITC proposes to route recovered or skimmed mixtures (diked area, ditch, Tucker Bayou, Ship Channel, and tanks), wash waters from cleaning equipment, and decontamination waters to their onsite WWTP for treatment and discharge under their TPDES authorization. Based on ITC's representations to TCEQ, the waste that it proposes to discharge includes firefighting foam, brine/saltwater contaminated with firewater/tank contents, foam and contents from the secondary containment, off-spec commercial chemical products, oily wastes, and hazardous decontamination wastes. As clearly identified in the RCRA regulations, any material that comes into contact with listed hazardous waste, including but not limited to soils, sediments, surface waters, solid surfaces, debris, and plant material are a hazardous waste (in this case, a listed waste). A RCRA hazardous waste may only be disposed of in a properly permitted hazardous waste treatment, storage, and disposal facility (TSDF). These wastes generated from this event are not authorized to be discharged under ITC's TPDES permit. Therefore, these wastes should be manifested to an authorized hazardous waste disposal facility for treatment and/or disposal. No recovery wastes or liquids are to be managed in the WWTP or treated on-site. The current TPDES permit DOES NOT authorize the treatment of the wastes generated from this event.